

1 **BOIES SCHILLER FLEXNER LLP**
2 David Boies (admitted *pro hac vice*)
3 333 Main Street
4 Armonk, NY 10504
5 Tel: (914) 749-8200
6 dboies@bsfllp.com
7 Mark C. Mao, CA Bar No. 236165
8 Beko Reblitz-Richardson, CA Bar No. 238027
9 Erika Nyborg-Burch, CA Bar No. 342125
10 44 Montgomery St., 41st Floor
11 San Francisco, CA 94104
12 Tel.: (415) 293-6800
13 mmao@bsfllp.com
14 brichardson@bsfllp.com
15 enyborg-burch@bsfllp.com
16 James Lee (admitted *pro hac vice*)
17 Rossana Baeza (admitted *pro hac vice*)
18 100 SE 2nd St., 28th Floor
19 Miami, FL 33131
20 Tel.: (305) 539-8400
21 jlee@bsfllp.com
22 rbaeza@bsfllp.com
23 Alison L. Anderson, CA Bar No. 275334
24 725 S Figueroa St., 31st Floor
25 Los Angeles, CA 90017
26 Tel.: (213) 995-5720
27 alanderson@bsfllp.com

1 **SUSMAN GODFREY L.L.P.**
2 William C. Carmody (admitted *pro hac vice*)
3 Shawn J. Rabin (admitted *pro hac vice*)
4 Steven M. Shepard (admitted *pro hac vice*)
5 Alexander Frawley (admitted *pro hac vice*)
6 1301 Avenue of the Americas, 32nd Floor
7 New York, NY 10019
8 Tel.: (212) 336-8330
9 bcarmody@susmangodfrey.com
10 srabin@susmangodfrey.com
11 sshepard@susmangodfrey.com
12 afrawley@susmangodfrey.com

13 Amanda K. Bonn, CA Bar No. 270891
14 1900 Avenue of the Stars, Suite 1400
15 Los Angeles, CA 90067
16 Tel.: (310) 789-3100
17 abonn@susmangodfrey.com

18 **MORGAN & MORGAN**

19 John A. Yanchunis (admitted *pro hac vice*)
20 Ryan J. McGee (admitted *pro hac vice*)
21 201 N. Franklin Street, 7th Floor
22 Tampa, FL 33602
23 Tel.: (813) 223-5505
24 jyanchunis@forthepeople.com
25 rmcgee@forthepeople.com

26 Michael F. Ram, CA Bar No. 104805
27 711 Van Ness Ave, Suite 500
28 San Francisco, CA 94102
29 Tel: (415) 358-6913
30 mram@forthepeople.com

31 **UNITED STATES DISTRICT COURT**
32 **NORTHERN DISTRICT OF CALIFORNIA**

33 CHASOM BROWN, WILLIAM BYATT,
34 JEREMY DAVIS, CHRISTOPHER
35 CASTILLO, and MONIQUE TRUJILLO
36 individually and on behalf of all similarly
37 situated,

38 Plaintiffs,

39 vs.

40 GOOGLE LLC,

41 Defendant.

42 Case No.: 4:20-cv-03664-YGR-SVK

43 **PLAINTIFFS' ADMINISTRATIVE**
44 **MOTION TO CONSIDER WHETHER**
45 **GOOGLE'S MATERIALS SHOULD BE**
46 **SEALED**

47 **CIVIL L.R. 79-5**

48 Referral: The Honorable Susan van Keulen

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed.

Document or Portion of Document Sought to Be Sealed	Party Claiming Confidentiality	Basis for Sealing
Portions highlighted in blue of Reply in Support of Plaintiffs' Motion to Exclude Portions of the Rebuttal Expert Report of Konstantinos Psounis (Dkt. 703)	Google	Contains Material Designated "Confidential" or "Highly Confidential" by Google pursuant to the Protective Order

Under Civil Local Rule 79-5(f), Google, as the designating party, bears the burden of establishing that the designated material is sealable.

Dated: September 21, 2022

BOIES SCHILLER FLEXNER LLP

By: /s/ Mark C. Mao

Mark C. Mao (CA Bar No. 236165)
mmao@bsflp.com

Beko Reblitz-Richardson (CA Bar No. 238027)
brichardson@bsflp.com
Erika Nyborg-Burch (CA Bar No. 342125)
enyborg-burch@bsflp.com
BOIES SCHILLER FLEXNER LLP
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Telephone: (415) 293 6858
Facsimile (415) 999 9695

David Boies (*pro hac vice*)
dboies@bsflp.com
BOIES SCHILLER FLEXNER LLP
333 Main Street
Armonk, NY 10504
Tel: (914) 749-8200

James W. Lee (*pro hac vice*)
jlee@bsflp.com
Rossana Baeza (*pro hac vice*)
rbaeza@bsflp.com
BOIES SCHILLER FLEXNER LLP
100 SE 2nd Street, Suite 2800
Miami, FL 33130
Telephone: (305) 539-8400
Facsimile: (305) 539-1304

1 Alison Anderson (CA Bar No. 275334)
2 aanderson@bsflp.com
3 BOIES SCHILLER FLEXNER LLP
4 725 S Figueroa Street
5 31st Floor
6 Los Angeles, CA 90017
7 Telephone: (213) 995-5720

8
9 Amanda Bonn (CA Bar No. 270891)
10 abonn@susmangodfrey.com
11 SUSMAN GODFREY L.L.P.
12 1900 Avenue of the Stars, Suite 1400
13 Los Angeles, CA 90067
14 Telephone: (310) 789-3100

15 Bill Christopher Carmody (*pro hac vice*)
16 bcarmody@susmangodfrey.com
17 Shawn J. Rabin (*pro hac vice*)
18 srbabin@susmangodfrey.com
19 Steven Shepard (*pro hac vice*)
20 sshepard@susmangodfrey.com
21 Alexander P. Frawley (*pro hac vice*)
22 afrawley@susmangodfrey.com
23 Ryan Sila (*pro hac vice*)
24 rsila@susmangodfrey.com
25 SUSMAN GODFREY L.L.P.
26 1301 Avenue of the Americas, 32nd Floor
27 New York, NY 10019
28 Telephone: (212) 336-8330

29 John A. Yanchunis (*pro hac vice*)
30 jyanchunis@forthepeople.com
31 Ryan J. McGee (*pro hac vice*)
32 rmcgee@forthepeople.com
33 MORGAN & MORGAN, P.A.
34 201 N Franklin Street, 7th Floor
35 Tampa, FL 33602
36 Telephone: (813) 223-5505
37 Facsimile: (813) 222-4736

38 Michael F. Ram, CA Bar No. 104805
39 mram@forthepeople.com
40 MORGAN & MORGAN
41 711 Van Ness Ave, Suite 500
42 San Francisco, CA 94102
43 Tel: (415) 358-6913

44 *Attorneys for Plaintiffs*